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February 27, 2003

Lawrence B. Rosenberg, Esquire
Court Square Building
200 E. Lexington Street
Suite 909
Baltimore, Maryland 21202

Re: United States v. \$17, 594.00 U.S. Currency
Civil No. MJG-02-4120

Dear Mr. Rosenberg:

In accordance with our recent conversation concerning the above-referenced forfeiture action, the following agreement is proposed. Once the agreement is fully executed and returned to me, I will forward it to the Court with a motion for an order of forfeiture. Once the order is entered, I will forward it to the appropriate agency for disposition.

SETTLEMENT AGREEMENT

This Settlement Agreement is made between Wayne Walker ("the claimant") and the United States of America ("the government"):

WHEREAS, the claimant filed a claim to the defendant \$17,594.00 U.S. Currency; and

WHEREAS, the claimant neither admits nor disputes the government's assertion that reasonable cause existed for the seizure of the defendant property; and

WHEREAS, the parties wish to reach a fair and expedited resolution to this matter;

NOW, THEREFORE, for the foregoing reasons and for good and substantial consideration, the adequacy and receipt of which is hereby acknowledged, the claimant and the government agree as follows:

EXHIBIT A

1. The government agrees to release \$3,520.00 of the defendant U.S. Currency to the claimant, by check made payable to Lawrence B. Rosenberg, Esquire.

2. The claimant agrees not to contest the forfeiture of the remaining \$14,074.00 of the defendant U.S. currency to the government and hereby relinquishes all right, title and interest therein.

3. The claimant agrees to indemnify and hold the government harmless from and against all claims, damages, losses, and action resulting from or arising out of the seizure and release of property described in paragraph 1 above.

4. The claimant agrees that the government may submit a copy of this agreement in connection with a request for an Order of Forfeiture.

5. This agreement states the entire agreement reached between the parties hereto.

Thomas M. DiBiagio
United States Attorney

3/27/03

Date

Charles J. Peters
Assistant United States Attorney

3/5/03

Date

Wayne Walker

3/5/03

Date

Wayne Walker

Lawrence B. Rosenberg, Esquire

Lawrence B. Rosenberg, Esquire